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"IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF ALABAMA NORTHERN DIVISION"

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2007 MAR -7 A 9:13

HAROLD M. ABRAHAMSEN JR.

2007 FEB 22 A 9:23

LEERA P. HACKETT, CLK

U.S. DISTRICT COURT

MIDDLE DISTRICT ALA

LEERA P. HACKETT, CLK

U.S. DISTRICT COURT

MIDDLE DISTRICT ALA

P.T. MARSHALL, et al

2:06-CV-1039-WKW

"A REBUTTAL OF DEFENDANTS ELEVEN DEFENSES OF ACTION"

b

"MOTION OF RECENSION AND STAY OF LEGAL PROCEEDINGS"

NOW COMES PLAINTIFF, TO REBUT DEFENDANTS ELEVEN DEFENSES OF ACTION AS TO FOLLOW BY NUMBER;

\* ONE - THE DEFENDANTS ATTORNEY(S) MUST BE PREDICATING THIS STATEMENT BASED ON SOME RULE OF LAW, UNKNOWN TO THE PLAINTIFF, AS A LAY PERSON, PLAINTIFF STATES THAT HE SEEKS MONITARY DAMAGES OF THE DEFENDANTS, FOR THE PHYSICAL PAIN AND SUFFERING, MENTAL ANGUISH, AND PHYSICAL DEFECTS THAT HAVE BEEN CAUSED BY DEFENDANTS WILLFUL AND NEGLIGENT ACTS, AND PLAINTIFF IS ASKING FOR A "REFORM" OF THE POLICIES AND PROCEDURES, OF COUNTY EMPLOYEES, THAT ALLOWED THE COUNTY EMPLOYEE'S, TO PERPETRATE THEIR ACTS ON PLAINTIFF.

\* TWO - PLAINTIFF BELIEVES THAT ANYTIME BASIC "CIVIL LIBERTIES", OR LEGAL DUE PROCESS RIGHTS ARE DEVIATED FROM THEIR NATURAL LEGAL COURSE OF HAPPENING, HIS CONSTITUTIONAL RIGHTS HAVE BEEN VIOLATED. PLAINTIFF BELIEVES THAT SPECIFIC NAMED DEFENDANTS DID JUST THAT WHEN THEY INTENTIONALLY AND WILLFULLY COMMITTED THEIR HARASSING ACTIONS AGAINST PLAINTIFF.

\* THREE - M.C.D.F. IS A BUILDING OWNED BY MONTGOMERY COUNTY, A LEGAL ENTITY<sup>(1)</sup> OF OUR GOVERNMENT. ITS STAFF

AND MANAGEMENT WITH A CHAIN OF COMMAND, RANGING IN RANK FROM THE HIGHEST TO LOWEST RANK, WITH THE HIGHER RANK MAKING UP POLICY AND PROCEDURE BY WHICH THE LOWER RANK ADMINISTERS OR ENFORCES THE SAME POLICY AND PROCEDURE, ALL OF WHICH MAKES UP THE "MONTGOMERY COUNTY DETENTION FACILITY" AS WE KNOW IT. PLAINTIFF BELIEVES THAT M.C.D.F. IS SUEABLE, AND IF IN FACT THERE IS A LAW THAT PREVENTS PLAINTIFF FROM SUING M.C.D.F., THE PLAINTIFF WILL SEEK TO CHANGE THE LAW.

\* FOUR — PLAINTIFF IS NOT AWARE OF THE "ELEVENTH AMENDMENT OR ITS CONTENT, HE HAS BEEN DENIED ACCESS TO LAW LIBRARY AT M.C.D.F. HOWEVER PLAINTIFF BELIEVES DEFENDANTS ACTIONS ARE THE PROXIMATE CAUSE OF PLAINTIFF'S SUFFERINGS

\* FIVE — PLAINTIFF DOES NOT BELIEVE THAT THESE COURT RULINGS WILL APPLY TO THE PRESENT ACTIONS OF DEFENDANTS

\* SIX — THESE PRISON "REGULATIONS" ARE NOT LAW ABIDING, JUST BECAUSE THE "SHERIFF AND DIRECTOR" OF FACILITY SAID IT, DOESN'T MAKE IT LEGAL, AND PLAINTIFF FEELS THEY WILL NOT BE FOUND TO BE RELATED TO PRISON REGULATIONS, BUT MORE A PERSONAL INTEREST OR ENDEAVOR.

\* SEVEN — PLAINTIFF HAS ALLEGED, FOR DEFENDANTS ATTORNEY'S, INJURIES SUSTAINED, AS A RESULT OF THE DEFENDANTS ACTIONS, HOWEVER, PLAINTIFF HAS NOT YET EXPLAINED EXACTLY HOW, SPECIFIED INDIVIDUALS PLAYED THEIR DIFFERENT ROLLS TO INJURE PLAINTIFF.

\* EIGHT — PLAINTIFF DOES NOT HAVE LAW BOOKS AVAILABLE TO HIM AS DEFENDANTS COUNSEL DOES AND THEREFORE CANNOT ASSERT (2)

WHETHER THE CASE CITED APPLIES ITSELF TO PLAINTIFF'S CASE, HOWEVER EVEN THOUGH, IN THEIR OFFICIAL CAPACITIES, THEY HAVE ACTED THEIR PARTS, PLAINTIFF IS SEEKING DAMAGES, NOT ONLY FROM INDIVIDUALS WHO, PLAYED THE FIDDLE, BUT ALSO, THOSE WHO MADE IT"

\* NINE — THIS DEFENSE IS THAT OF THE BASIC SAME PRINCIPAL AS DEFENDANT'S ATTORNEY'S HAVE INDICATED TOO IN DEFENSE #7 AND PLAINTIFF WOULD ARGUE THE POINT AND PLAINTIFF HAS INDICATED THE NATURE OF INJURIES

\* TEN — PLAINTIFF MADE DEFENDANTS AWARE OF HIS MEDICAL NEEDS ON JULY 28<sup>TH</sup> 2004, JULY 1<sup>ST</sup> 2005, AND OCTOBER 20, 2006 RESPECTIVELY. PLAINTIFF IS STILL SUFFERING FROM AN ADVANCING STAGE OF "LUNG DISEASE", A DEBILITATING CASE OF "DEGENERATIVE ARTHRITIS", "HIGH BLOOD PRESSURE", NOW ASSOCIATED WITH A UNKNOWN "HEART CONDITION", THAT WILL NOW BE SOON DIAGNOSED "1<sup>ST</sup> STAGE EMPHYZEMA", AND NOW A "PROSTRATE INFECTION" JUST DIAGNOSED, ALL OF WHICH PLAINTIFF STATES, HAS BECOME A WORSENED CONDITION BECAUSE OF DEFENDANTS ACTIONS.

\* ELEVEN — PLAINTIFF BELIEVES THAT HE SHOULD BE ALLOWED TO SEEK THE IDENTITIES OF INDIVIDUALS PLAINTIFF CAN RECOGNIZE BY SIGHT, BUT HAS NOT YET IDENTIFIED BY NAME AND THE MERE FACT THAT PLAINTIFF CANNOT IDENTIFY THESE INDIVIDUALS BY NAME, SHOULD NOT BE A REASON FOR PLAINTIFF TO NOT SEEK RELIEF OF HIS SUFFERINGS CAUSED BY THESE DEFENDANTS PLAINTIFF NOW STATES; DEFENDANTS HAVE USED JUST ABOUT EVERY "EXCUSE IN THE BOOK" AS TO WHY THEY SHOULD NOT BE HELD ACCOUNTABLE FOR THEIR ACTIONS EXCEPT THAT THEY DIDN'T DO IT.

JOB: 36-1-33(3)

"PLAINTIFF NOW REFUTING DEFENDANTS AFFIDAVIT CLAIMS"

NOW COMES PLAINTIFF; IN RESPONSE TO INDIVIDUAL "AFFIDAVITS" OF STAFF AND MANAGEMENT OF M.C.D.F. AS CONTAINED IN THEIR "Special Report" A RESPONSE TO A JANUARY 4<sup>TH</sup>, 2007 COURT ORDER. PLAINTIFF IS NOT YET IN RECEIPT OF HIS HONOR'S JANUARY 4<sup>TH</sup> ORDER AND IS JUST RECEIVING A COPY OF M.C.D.F.'S "Special Report" ON FEBRUARY 13<sup>TH</sup> 2007. PLAINTIFF STATES AS FOR; AFFIDAVIT OF D.T. MARSHALL, SHERIFF OF MONTGOMERY COUNTY IT APPEARS TO PLAINTIFF, TO BE A PUBLIC RELATIONS EFFORT AND HAS NO REAL VALUE AS AN ATTESTMENT OR DENIAL OF THE FACTS IN THIS CASE AND THAT, PLAINTIFF BELIEVES THE DOCUMENT IS A COWARDLY ATTEMPT TO PASS HIS RESPONSABILITY ON TO "DIRECTOR GINA SAUAGE"

AFFIDAVIT OF GINA SAUAGE; PLAINTIFF BELIEVES THAT "DIRECTOR SAUAGE" ATTEMPTS TO MALIGN PLAINTIFF WITH HER HALF TRUTHED DIScription OF HIS CRIMINAL HISTORY, AND FEELS IT HAS NO BEARING ON THIS CASE. PLAINTIFF STATES FOR THE RECORD, ON September 2 1999 HE WAS CHARGED WITH THIS FALSELESS CHARGE, BONDED OUT 15 MINUTES LATER, AND THESE CHARGES WERE THEN DROPPED IN "Honorable Judge Thomas's Court" AT PLAINTIFF'S PRELIMINARY HEARING. PLAINTIFF FURTHER STATES THAT HE BELIEVES THE REASON FOR HIS INITIAL ARREST IN THAT CASE, WAS BECAUSE HE WAS ENGAGED IN ACTIVITY TO RID KNOWN DRUG DEALERS FROM HIS SOON TO BE TOWNHOUSE(S) LOCATED ON "Upper Wetumpka Rd" Mont Al., CLOSE TO, AND AFFILIATED WITH, A LOCAL "DRUG CARTELL" FROM THE "King Hill" AREA, THAT WAS, AN IS, RUMORED TO HAVE AN ASSOCIATION WITH SHERIFF D.T. MARSHALL. PLAINTIFF STATES THAT THE, N.W.N.I., IS REPRESENTATIVE OF (10) CHECKS THAT WERE REVOKED BY PLAINTIFF'S BANKS IN 2003 WHEN HE SHOT HIS BUSINESS DOWN. THE CHECKS TOTAL LESS THAN \$550.<sup>00</sup> FACE VALUE, AND "District Court & District Attorney's Office" PRESENTLY HAVE IMPOSED MORE THAN \$5,000<sup>00</sup> IN COURT COSTS AND RELATED FEE'S THE TOTAL OF WHICH REFLECTS THE \$6495.05 FIGURE DENOTED IN THIS

AFFIDAVIT, PLAINTIFF FURTHER STATES; THAT "PLEADINGS" SENT TO THE "DISTRICT COURT CLERK'S" OFFICE REGARDING THESE CHARGES BY INTEROFFICE MAILINGS AND U.S. MAILINGS ARE A PORTION OF THE SAME MAILINGS THAT PLAINTIFF HAS MADE COMPLAINT ABOUT IN THIS CASE AND THEIR "WILFUL AND ILLEGAL OBSTRUCTION" BY M.C.D.F. STAFF(S). THE "I.D. THFT" CHARGE IS JUST THAT, A CHARGE, NOT A CONVICTION AND FINALLY "GIVING A WRONG NAME" AND "OBSTRUCTION OF JUSTICE" BOTH STEM FROM THE SAME INCIDENT OF OCTOBER 20<sup>TH</sup> 2006 AND HAVE NOT BEEN HEARD BY A JUDGE. PLAINTIFF AGAIN STATES HE HAS HAD HIS PAPERWORK TO THE "DISTRICT & CIRCUIT COURT CLERK'S OFFICE'S" TAMPERED WITH, IN AN EFFORT HE BELIEVES, TO DENY HIM OF HIS "DUE PROCESS RIGHTS" WITHIN THOSE COURTS. FINALLY WITH RESPECT TO ITEM #3, A HOLD EXISTS IN "AUTAGA CO" FOR AN "ELEVENTH CHECK" FROM THE SAME PERIOD OF THE N.W.N.I. CHARGE AS SHOWN ABOVE AND PLAINTIFF STATES HE IS LOOKING FORWARD TO HANDLING THIS CHARGE IN AUTAGA CO. PLAINTIFF STATES THAT ITEM NO. FOUR'S "RESPONSES TO PLAINTIFF'S 5 CAUSES OF ACTIONS" ARE MERELY A WHOLE LOT OF PUBLIC RELATION RETORIC AND AGAIN PLAINTIFF BELIEVES THE ONLY SIGNIFICANT TRUTH OF THIS AFFIDAVIT IS THAT NOW "DIRECTOR GINA SAVAGE" TAKES THE COWARDLY POSITION OF PASSING RESPONSABILITIES OF HER STAFF'S INVOLVEMENT IN PLAINTIFF'S "SECOND CAUSE OF ACTION" ON TO "SOUTHERN HEALTH PARTNERS" ENTIRELY. PLAINTIFF STATES AS FOR CAUSE ONE RESPONSE, THAT COPIES INCLUDED IN THIS "SOCIAL REPORT" ARE DUPLICATES AND DOUBLE COPIES, MEANT TO IMPRESS SOMEONE OTHER THAN PLAINTIFF. PLAINTIFF STATES THAT THESE DOCUMENTS ON ONE HAND ARE NOT A COMPLETE CATALOGUE OF THE DOCUMENTS THAT HAVE BEEN FILED WITH STAFF AT H.C.D.F. FROM TIME TO TIME, BY PLAINTIFF AND ON THE OTHER HAND MANY OF THESE DOCUMENTS SHOWN, ALONG WITH THOSE THAT WERE CONVENIENTLY OMITTED

FROM DEFENDANTS "SPECIAL REPORT", ACTUALLY LEND TRUTHS TO PLAINTIFFS ACTION UNDER "CAUSE ONE" OF HIS COMPLAINT. PLAINTIFF STATES THE ENVELOPE COPIES, ADDRESSED TOO; "MS OPAL BLACKWELL" AND "MR HAROLD M. ABRAMSON" RESPECTIVELY. PLAINTIFF STATES THAT HIS REQUESTS TO HAVE HIS MAIL RETURNED TO HIM, WITH THE 1ST SUCH REQUEST OCCURRING JUST 4 DAYS AFTER THE MAILINGS CAME UP MISSING, WENT UNANSWERED AND IS NOT CONTAINED IN THIS REPORT, AS WELL AS, NUMEROUS COMPLAINTS FILED ABOUT MEDICAL & CLEANLINESS OF THE FACILITY, AS OUTLINED IN "CAUSE THREE" BELOW. PLAINTIFF FURTHER STATES HE AGAIN HAS NUMEROUS SITUATIONS TO SITE, LENDING TRUTH TO HIS ALLEGATIONS. AS FOR "CAUSE THREE & FOUR'S" RESPONSE, PLAINTIFF STATES THAT HE BELIEVES THAT "DIRECTOR SAVAGE" SHOULD BE HELD ACCOUNTABLE, AND WOULD URGE HIS "HONORABLE WALLACE CAPEL JR." TO HOLD HER CRIMINALLY LIABLE, UPON COMPLETION OR DURING THIS LITIGATION, FOR PURGERY THAT PLAINTIFF NOW ACCUSES HER OF. PLAINTIFF STATES THAT CHEMICALS ARE NOT PROVIDED EVERY DAY AND THIS WILL BE EASILY PROVEN IN OPEN COURT, IF PLAINTIFF IS GIVEN THE OPPORTUNITY. PLAINTIFF STATES WHEN CHEMICALS ARE PROVIDED, THEY ARE DESPENSED IN 3 SMALL, USUALLY INOPERABLE CONTAINERS, WITH APPROXIMATELY 3 GALLONS OF WATER, MOST TIMES THE WATER BECOMES TO DIRTY AND LESS THAN 3 QTS OF CHEMICALS ARE USED TO SANITIZE 3 TO 5 THOUSAND SQ FT OF SPACE AND NUMBERS OF FIXTURES AMOUNTING TO SOMETIMES 30 OR MORE. PLAINTIFF STATES IN 17 WEEKS OF INCARCERATION HE HAS NEVER SEEN A "HEALTH DEPARTMENT OFFICIAL" IN THE FACILITY. PLAINTIFF STATES HE CAN THINK OF A RECENT SITUATION WHERE INMATES WERE, BY COHESION, FORCED TO CLEAN BUILT-UP FILTH ON FRONTAL AREAS OF A CELL BLOCK AREA, IN WHAT APPEARED TO BE AN EFFORT TO IMPRESS INCOMING GUESTS TO THE FACILITY (SEE PLAINTIFF'S CRIMINAL COMPLAINT FILED TOO; S/A IN CHARGE AT MONT. OFFICE OF F.B.I., ON OR ABOUT FEB 14<sup>th</sup>, 2007) PLAINTIFF STATES, GIVEN THE OPPORTUNITY

(6)

HE WILL PROVE THAT "DIRECTOR SAUANGE" AGAIN PERJURES HERSELF IN THIS SPECIAL REPORT!" PLAINTIFF STATES HE WILL SHOW NOT ONLY THE ABOVE, BUT WILL ALSO SHOW THAT DEFENDANTS RESPONSE TO PLAINTIFFS "THE CAUSE OF ACTION" IS ALSO AN INCORRECT STATEMENT, IN THAT AS IT WILL BE EVIDENCED, FOOD IS BY NO MEANS PREPARED IN A HEALTHFUL ENVIRONMENT, IN FACT THE KITCHEN AREA OF THIS FACILITY HAS RODENT AND ROACH INFESTATIONS AND PLAINTIFF REFUTES THAT INMATES ARE FED 3 NUTRICIOUS MEALS A DAY, WHILE IN FACT INMATES RECEIVE A "SACK LUNCH" IN THE AM OF THE DAY TO SUSTAIN THEM FOR 11-12 HOURS AND THEN RECEIVE SOMEDAYS A BALANCED MEAL IN THE P.M. HOURS, AND THAT THE ON SITE NUTRITIONISTS ARE EMPLOYEE'S OF "Southern Health Partners", THE MEDICAL PROVIDERS, NAMED IN THIS ACTION, AGAINST MCDF. PLAINTIFF STATES AS FOR "DIRECTOR SAUANGE'S" RESPONSE TO "CAUSE FIVE", OF PLAINTIFFS ACTION, THAT HE FEELS THAT BECAUSE OF THE WHITING / TAMPERING, OF THE "FREE MOVE MENT OF PAPERWORK", CREATES A SITUATION IN ITSELF TO OVERCROWD THE JAIL BY DENYING INMATES OF THEIR "Due process Rights" AND THEREBY DELAYING THEIR RELEASE FROM THE FACILITY. PLAINTIFF BELIEVES THAT THIS IS BEING DONE IN AN INTENTIONAL MANNER, AS TO RECEIVE ADDITIONAL FUNDS FROM THE "FEDERAL GOVERNMENT" THROUGH SUBSIDYS) THAT THEY NOW ENJOY, AN I BELIEVE ARE BEING USED, TO FINANCE THE BUILDING OF A NEW JAIL, AT THE EXPENSE OF SOME, INNOCENT CITIZENS, BY THEIR LENGTHLY DETAINMENT @ MCDF. "AFFIDAVIT OF WANDA J. ROBINSON"; PLAINTIFF STATES HE BELIEVES THAT THIS AFFIDAVIT IS A LOT OF REPETITIVE RUMOR & DESIGNED TO DEIFY THE OVERALL CONTENT OF THIS FRIVOLOUS "SPECIAL REPORT" BY THE DEFENDANTS ATTORNEY "AFFIDAVIT OF BARBARA PALMER-BYRD", PLAINTIFF WOULD REPEAT THAT THE FREE OR CATALOGUE OF REQUEST/GRIEVANCE FORMS ARE, INCOMPLETE, DUPLICATED COPIES AND PLAINTIFF WOULD URGE HIS "HONOR WALLACE CAPER" TO REQUEST STAFF AND MANAGEMENT, TO OFFER TO THE TABLE A COMPLETE CATALOGUE OF THESE

REQUESTS AND GRIEVANCES. PLAINTIFF ADDITIONALLY STATES, THAT ONCE AGAIN "CAPTAIN PALMER" IS FAILING TO TAKE RESPONSABILITY FOR HER ACTIONS AS A SUPERVISOR OF M.C.D.F. AND APPEARS TO BE COWARDLY PASSING THE BUCK ON, WITH REGARD TO HER ADMONISHMENT IN ITEM #4 AND THAT THE OVERALL CONTENT IS JUST REPETITIVE RETORIC DESIGNED BY THEIR ATTORNEY TO DEIFY THIS FRIVOLOUS "SPECIAL REPORT"!

AFFIDAVIT OF LT. ANNIE FINDLEY; SAME HALF TRUTHED RETORIC

AFFIDAVIT OF MS SON德拉 WRIGHT; PLAINTIFF PRAYS THAT UPON REVIEW OF HIS EVIDENCES, THAT "MS WRIGHT" IS HELD CRIMINALLY LIABLE FOR HER ACTIONS, AS WELL AS ANY INDIVIDUALS THAT HAVE AIDED AND ABETTED HER, IN HER ACTIONS AGAINST PLAINTIFF. PLAINTIFF STATES THAT "DEFENDANT WRIGHT" ADMITS TO DESTROYING PLAINTIFF'S PERSONAL MAIL AND PLAINTIFF FURTHER REVIEWS THAT HE REQUESTED THE RETURN OF SAME, TWICE, THE 1ST TIME WAS 4 DAYS AFTER ITS KNOWN DISAPPEARANCE AND THAT HER RECORDS REFLECT SELECTIVE AND INCOMPLETE ENTRIES AS WILL BE SHOWN WITH PLAINTIFF'S EVIDENCE'S PLAINTIFF FURTHER STATES; THAT HIS EVIDENCE'S WILL SHOW THAT AT LEAST ONE OF "MS WRIGHT'S" ENTRIES NOTED IN HER AFFIDAVIT IS A "MAGICAL REAPPEARANCE" OF A CRITICAL U.S. MAILING FOR PLAINTIFF'S DEFENSE.

IN REGARDS TO HIS CRIMINAL CHARGES AT DISTRICT COURT, AND SAID MAILING WAS PREVIOUSLY REQUESTED FOR RETURN, AND THAT ITS PRESENCE AS LISTED IN "MS WRIGHT'S LOG", LENDS TRUTH TO PLAINTIFF'S BELIEFS, OF STAFF(S) WILLFULLY INTERFERING, WITH THE NATURAL FLOW OF INTER-OFFICE AND U.S. MAILINGS AT M.C.D.F. PLAINTIFF STATES THAT BY WAY OF "MS WRIGHT" THE FACILITY BEGAN MONITORING HIS MAILING AS HE KNOWS JUST 4 DAYS AFTER HE ORGANIZED A COMPLAINT/GRIEVANCE ABOUT THE UNSANITARY CONDITIONS IN THE FACILITY AND JUST 3 DAYS AFTER THE "MONT. CO. SHERIFFS DEPT." CHARGED PLAINTIFF WITH THE FRIVOLOUS CHARGE OF "OBSTRUCTION".

OF JUSTICE" THAT HE HAS NOW BEEN DETAINED ON SINCE NOVEMBER 14<sup>TH</sup> 2006. BOOKING OFFICER CARROLL" INDICATED ON THE 14<sup>TH</sup> OF NOV. THAT THE CHARGE STEMED FROM AN OCTOBER 20<sup>TH</sup> 2006 INCIDENT, THE DAY OF PLAINTIFFS ARREST.

AFFIDAVIT OF MS ALBERTA BROWN; PLAINTIFF STATES THAT "MS BROWN" ROUTINELY BRINGS LEGAL MAILINGS INTO CELLBLOCK AREAS FOR DISTRIBUTION TO INMATE POPULATION THAT HAS ALREADY BEEN OPENED AND HAS DONE THIS TWICE RECENTLY WITH PLAINTIFFS LEGAL MAIL. PLAINTIFF STATES HE HAS SENT AN INQUIRY / GREIUNACE TO "MS DAVIS" CONCERNING THIS, HOWEVER IT REMAINS UNANSWERED AT THIS TIME. PLAINTIFF STATES THAT HE BELIEVES THE BALANCE OF "MS BROWNS AFFIDAVIT" AMOUNTS TOO REPETITIVE RETORIC DESIGNED TO DEIFY THE OVERALL CONTENT OF THIS "Special Report" BY DEFENDANTS ATTORNEYS  
PLAINTIFF NOW STATES; THE FOLLOWING WITH RESPECT TO COPIES OF PLAINTIFFS MAILINGS, REQUEST FORMS, GREIUNACE DESISSIONS, & GREIUNACE FILINGS ETC. THE OVER ALL CATALOGUE IS NOT REPRESENTIVE OF ALL DOCUMENTS FILED BY PLAINTIFF AND HIS EVIDENCES WILL SHOW THAT THEY ARE LACKING IN CONTENT. PLAINTIFF STATES THAT HE BELIEVES DEFENDANTS ARE ATTEMPTING TO CREATE A FAÇADE AND PRESENT A MISLEADING REPRESENTATION OF THE FACTS IN THIS CASE.  
PLAINTIFF STATES; THAT GIVEN THE OPPORTUNITY TO PRESENT HIS CASE, HE SHALL SHOW THE INDIFFERENCE, AND PROPENSITY OF DEFENDANTS, BY POLICY, TO COVER UP WHAT HAS BECOME COMMON EVERY DAY OCCURANCES IN THIS FACILITY, AND HE FEELS CERTAIN THAT IF HIS "Honor WALLACE Paper" WERE IN POSSESSION OF A COMPLETE, LEGIBLE CATALOGUE OF THESE DOCUMENTS HE WOULD FURTHER UNDERSTAND THE GRAVITY OF PLAINTIFF'S COMPLAINTS. PLAINTIFF FINALLY STATES THAT HE HAS UTILIZED M.C.D.F.'S "GREIUNACE PROGRAM" IN AN EFFORT TO DOCUMENT THE "RIGHTS VIOLATIONS" WITHIN THE FACILITY, BUT HAS NEVER KNOWN MANAGEMENT

(9)

TO CORRECT OR REPRIMAND ANY OFFICER(S) OR SITUATION(S), RIGHT OR WRONG.

"MOTION OF RECENSION AND STAY OF LEGAL PROCEEDINGS"  
(TO EXTEND PRESENT TIME-LINES OF ACTION)

Now Comes Plaintiff, who states that he is presently, still being detained in a sequestered fashion without the ability to use telephone and having his mailings and interoffice correspondences monitored and obstructed. Plaintiff states, defendants have further caused his detainment to be prolonged. Plaintiff states that recent readings have been received and filed by "Court Clerks Office" and Plaintiff was brought before "Justice Yates" on 3-12-2007 and set off. Plaintiff also has a court appearance date finally for trial before His "Honor Shashy" on 3-12-2007. Plaintiff has no known date of release at this time. Plaintiff has not been allowed adequate access to "Law Library" at M.C.D.F., and does not have sufficient supplies of pencils, paper, reference materials, lighting, adequate fixtures (i.e. a writing surface) and certainly does not have access to word processing equipment as defendants now enjoy. Plaintiff states he is forced by need to write on the base metal surface of his sleeping bunk with primitive means, requiring long arduos hours, in loud, distracting, and poorly lit environments.

Plaintiff further states; that he has previously plead to His "Honor Wallace Capel Jr.", that Plaintiff is in fact a layperson with respect to the law. Plaintiff states he is not in receipt of "His Honor's Order", directing defendants to respond to Plaintiff's civil action against defendants, but is in receipt of copies (legible) of supplemental articals that have apparently sub-

MITTED TO "HIS HONOR". PLAINTIFF BELIEVES THAT THE "SPECIAL REPORT" AS A COPY OF THE SUBMITTED "SPECIAL REPORT" BY DEFENDANTS IS FULL OF MISREPRESENTATIONS, UNTRUTHS, AND CITE LEGAL CASE REPRESENTATIONS THAT PLAINTIFF IS UNAWARE OF, IN THEIR CONTEXT, AND MEANINGS WITH REALTIVITY TO PLAINTIFF'S CASE, AND THEIR APPEAR TO BE OVER "Sixty Five Such References". PLAINTIFF SPECULATES CONFIDENTLY; WHEN HE STATES HE DOES NOT BELIEVE THAT DEFENDANTS ATTORNEYS, "THOMAS T. GALLION" OR "CONSTANCE C. WALKER", AS QUALIFIED AS THEY MAY BE AT THEIR CHOSEN PROFESSION, CAN OR WILL BE ABLE TO CITE OR RECITE THE LARGE NUMBER OF CASE'S THEY REFER TOO, WITHOUT THE AID OF THEIR LAW LIBRARY.

PLAINTIFF NOW STATES; HE HAS READ AND UNDERSTANDS THAT DEFENDANTS ATTORNEYS HAVE CITED NUMEROUS REASONS WHY DEFENDANTS AND MLDF. SHOULD NOT BE HELD ACCOUNTABLE FOR THEIR ACTIONS, HOWEVER PLAINTIFF WAS RAISED BY, AND TAUGHT A MORAL STANDARD, THAT SAYS WE AS INDIVIDUALS, SHOULD BE ACCOUNTABLE FOR OUR ACTIONS. PLAINTIFF FURTHER STATES; HE BELIEVES THESE ARE THE SAME PRINCIPALS THAT OUR "FOUNDING FATHER'S" INTENDED BY, THE GRACE OF OUR "LORD ALMIGHTY, IN GOD WE TRUST".

PLAINTIFF NOW STATES; HE INTENDS WITHIN A REASONABLE AMOUNT OF TIME, AFTER HIS RELEASE, TO SEEK COMPIDENT LEGAL REPRESENTATION FOR THIS ACTION, POSSIBLY ATTORNEYS FROM THE "SOUTHERN POVERTY LAW CENTER" IN MONT. AL., HOWEVER IN PLAINTIFF'S NOW SEQUESTERED POSITION, AS HE IS BEING DETAINED BY DEFENDANTS, AND NOT BEING GIVEN ACCESS TO BASIC

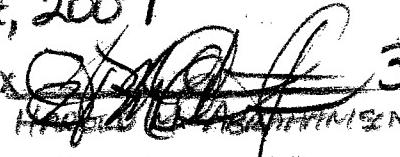
CLERICAL NEEDS AND M.C.D.F.'S LAW LIBRARY, PLAINTIFF CANNOT SEE HOW HE CAN IN EFFECT CHALLENGE, DEFENDANTS AND THEIR ATTORNEY'S AT THIS TIME.

PLAINTIFF FURTHER STATES; THAT HE FEELS THAT DEFENDANT'S HAVE CONTINUED TO VIOLATE HIS CIVIL RIGHTS THROUGHOUT HIS CONFINEMENT, AS WELL AS, EFFECTING HIS "Due Process Rights" IN "DISTRICT AND CIRCUIT COURTS" RESPECTIVELY. PLAINTIFF STATES DEFENDANTS, AS IN CERTAIN MEMBERS OF STAFF AND MANAGEMENT, HAVE CONTINUED IN A WILLFUL, RETALIATORY MANNER, TO DEPRIVE PLAINTIFF OF "BASIC HUMAN RIGHTS", CAUSING HIM FURTHER MENTAL ANGUISHES, AND LACK OF HEALTH. PLAINTIFF FURTHER STATES; THAT HIS CARE BY "SOUTHERN HEALTH PARTNERS" & "DR NICHOLS" HAS GREATLY IMPROVED OVER THE SAME PERIOD.

WHEREBY PLAINTIFF NOW PRAYS; OF THE HONORABLE JUDGE WALLACE CAPEL JR "TO GRANT PLAINTIFF AN EXTENTION OF THE PRESENTLY REPRESENTED TIMELINE, CONTAINED IN HIS ACTION AGAINST "MONTGOMERY COUNTY DETENTION FACILITY", AND ITS STAFF AND MANAGEMENT AS PREVIOUSLY DENOTED, TO NOW INCLUDE THE PERIOD FROM THE DATES JULY 1 2005 TO JULY 28<sup>TH</sup>, 2005 & OCTOBER 20<sup>TH</sup> 2006 TO "MARCH 6<sup>TH</sup> 2007" PLAINTIFF FURTHER PRAYS; THAT "HIS HONOR" WOULD GRANT PLAINTIFF A STAY ON ALL LEGAL PROCEDURES AND PROCEEDINGS IN THIS CASE UNTIL 60 DAYS AFTER PLAINTIFF'S RELEASE FROM INCARCERATION AT THE M.C.D.F.

GIVEN THIS 6<sup>TH</sup> DAY OF MARCH, 2007

(12)

 3.5.2007  
John C. Chapman Jr.

"CERTIFICATE OF SERVICE"

I HEARBY CERTIFY THAT ON THE 5<sup>TH</sup> DAY  
OF MARCH 2007, I DID MAIL A HAND WRITTEN COPY  
OF THE FORGOING, BY PLACING IN THE UNITED STATES  
MAIL, POSTAGE PREPAID, THIS THE 5<sup>TH</sup> DAY OF  
MARCH, 2007, TO THE FOLLOWING:

HASKELL SLAUGHTER, YOUNG & GALLION LLC  
P.O. Box 4660 (ATTYS AT LAW)  
MONTGOMERY AL 36103-4660

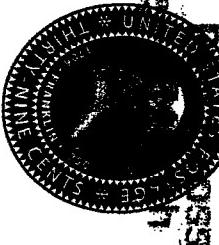
2/M/07  
Harold M. Abramson Jr.

Mr. D. H. Abingdon Jr.  
Jeff H. M. D. Jr.  
P.O. Box 4599  
Montgomery AL 36103

MONTGOMERY AL 361

06 MAR 2007 PM 11:00 AM

March 13



U.S. District Court  
Debra P. Hinesett, Court Clerk  
P.O. Box 111  
Montgomery AL 36101-0111

INMATE MAIL

3415145711